REMARKS

The Office action has been carefully considered. The Office action rejected claims 1-5, 13-15, 22-23 and 25 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,452,609 to Katinsky et al. ("Katinsky"). Further, the Office action rejected claims 6-7 under 35 U.S.C. §103(a) as being unpatentable over Katinsky in view of U.S. Patent No. 6,144,962 to Weinberg et al. ("Weinberg"). Still further, the Office action rejected claims 8-11 under 35 U.S.C. §103(a) as being unpatentable over Katinsky in view of U.S. Patent No. 5,802,292 to Mogul et al. ("Mogul"). Finally, the Office action rejected claims 12, 16-21 and 24 under 35 U.S.C. §103(a) as being unpatentable over Katinsky in view of U.S. Patent No. 5,870,769 to Freund et al. ("Freund"). Applicants respectfully disagree.

By present amendment, claims 1 and 13 have been amended for clarification and not in view of the prior art. Applicants submit that the claims as filed were patentable over the prior art of record, and that the amendments herein are for purposes of clarifying the claims and/or for expediting allowance of the claims and not for reasons related to patentability. Reconsideration is respectfully requested.

Applicants thank the Examiner for the interview held (by telephone) on February 19, 2004. During the interview, the Examiner and applicants' attorney discussed the claims with respect to the prior art. The essence of applicants' position is incorporated in the remarks below.

Prior to discussing reasons why applicants believe that the claims in this application are clearly allowable in view of the teachings of the cited and applied references, a brief description of the present invention is presented.

The present invention is directed to a system and method for retrieving information about web pages before committing to downloading the web pages. That is, a user of a browser may decide whether or not to pursue a link based on information that is displayed when the user maneuvers a cursor over the link with an input pointing device. Maneuvering a cursor over a link is sometimes referred to as "mousing over" a link or "hovering" over a link. In this manner, the user of the browser may read information displayed in an information region near the moused over link in order to decide (based on the displayed information, such as title, keywords, or other links within the linked web page) whether to pursue the link (by then clicking the link).

For example, when a web page is first fetched, the contents of the web page are parsed and displayed through a browser in a well-known manner. Then, each of the links in the fetched web page is identified and then information about each of the web pages corresponding to the identified links is obtained. This information may be stored in a separate local cache, a proxy cache, or a localized server such that the information collected for each of the linked web documents is easily retrieved. When a user maneuvers a cursor, controlled by the mouse, to hover over one of the identified links, an information region containing the information that was retrieved that corresponds to that particular link is displayed near the link. Thus, the user may make a more informed decision about whether or not to follow

the link. Note that the above description is for example and informational purposes only, and should not be used to interpret the claims, which are discussed below.

Turning to the claims, independent claim 1, as amended, recites a client-side computer-implemented method comprising fetching a current web page, the current web page including one or more links, each link pointing to a web page, fetching information regarding the web page to which each link points, wherein the information is stored separately from the current web page, displaying the current web page, and, displaying an informational region, in response to a cursor hovering over a particular link of the one or more links, the region including the information previously fetched regarding the web page to which the link points.

The Office action rejected claim 1 as anticipated by Katinsky. More specifically, the Office action contends that Katinsky teaches fetching content for a current web page, the content including one or more links, each link pointing to a web page. Figure 1 of Katinsky is referenced. Further, the Office action contends that Katinsky teaches fetching information regarding the web page to which each link points, wherein the information is stored separately from the current web page. Figure 10 of Katinsky is referenced. Still further, the Office action contends that Katinsky teaches displaying the content for the current web page. Again, Figure 1 of Katinsky is referenced. Finally, with respect to claim 1, the Office action contends that Katinsky teaches displaying an informational region, in response to a cursor hovering over a particular link of the one or more links, the region including the information previously fetched regarding the web page to which the link points. Column 5, lines 28-34 of Katinsky is referenced. Applicants respectfully disagree.

The cited and applied reference describes, generally, a browser page having a media player for playing media objects. Further, Katinsky, generally describes displaying media icons with the media objects so a browser is able to display some kind of corresponding representation of a media object (music, video, etc.) on a web page. See generally, Column 3, lines 55-62 of Katinsky. As such, Katinsky describes a system and method of displaying media objects without displaying a web page. That is, media objects are fetched and then media object icons that correspond to each of the fetched media objects are displayed on a browser that looks like a web page (a pageless Internet site). This depiction, however, is merely a generated display that allows a user to functionally see media objects that cannot typically be "seen" on a web page. Thus, a pageless Internet site is an inversion of a conventional website because the principle organization of the displayed page is not a relationship between pages (*i.e.*, links) but rather a relationship between media objects. See Column 3, line 63 to Column 4, line 6 of Katinsky. Furthermore, any information displayed about one of the media objects is displayed after a mouse click and the information about the media object is downloaded concurrently with the media object.

As such, Katinsky fails to teach several limitations of claim 1. First, claim 1 recites fetching a current web page, the current web page including one or more links, each link pointing to a web page and displaying the current web page. As shown above, Katinsky does not teach fetching a web page, let alone fetching a web page that includes one or more links. Rather, Katinsky teaches fetching one or more media objects and then creating links on a pageless Internet site such that

a user may click an icon and instantiate the media object. Further, Katinsky teaches displaying a pageless Internet site that simply contains links to the already downloaded media objects and not other web pages (or even other media objects). Simply stated, Katinsky does not teach fetching a web page as recited in the first element of claim 1.

Second, Katinsky does not teach displaying an informational region, in response to a cursor hovering over a particular link of the one or more links. Rather, Katinsky teaches displaying information in response to a user clicking on a pop-up menu. Significantly, clicking on a pop-up menu is not the same as hovering over a link as recited in claim 1.

Third, Katinsky does not teach that the region includes the information previously fetched regarding the web page to which the link points. Rather, Katinsky teaches displaying information about the media object itself. In other words, to (mis)interpret Katinsky to disclose this aspect of claim 1, it would necessarily follow that in the present invention, when a cursor hovered over a link, the information about the link (as opposed to the web page to which the link points) would be displayed. Of course, this would be entirely redundant and not very useful. Instead, with the present invention as claimed, when a cursor hovers over the link, information about the corresponding web page is displayed wherein the information itself was previously retrieved. Further, also significantly different from the teachings of Katinsky, the previously retrieved information about the corresponding web page is stored separately from the current web page.

For at least the foregoing reasons, applicants submit that claim 1 is allowable over the prior art of record.

With regard to claims 2-12, these claims depend either directly or indirectly from claim 1. Applicants submit that claims 2-12 are also allowable for the additional patentable elements included in these claims.

As but one example, claim 3 generally indicates that a user is able to retrieve the information regarding the web page without selecting the link and committing to downloading the web page. That is, the information is retrieved without "clicking" the link. In direct contrast, the system and method taught by Katinsky requires "clicking" on a pop-up menu to obtain any information about the media objects. Thus, for at least this additional reason, applicants submit that claim 3 is allowable over the prior art of record.

With regard to claims 6 and 7, the Office action rejected these claims under 35 U.S.C. §103(a) as being unpatentable over Katinsky in view of Weinberg. More specifically, the Office action contends that Figure 22 of Weinberg teaches that the information regarding the web page includes at least information based on a user's relationship to the web page. The Office action then concludes that it would have been obvious to a person skilled in the art at the time the invention was made to combine the teachings of Katinsky and Weinberg to arrive at the recitations of claims 6 and 7 because the visualization by the user of the overall architecture of the web site would allow the user to navigate the map in an intuitive manner to explore the content of the web site. Applicants respectfully disagree.

Weinberg teaches, generally, a visual web site analysis program whereby a web site is mapped by a visualization technique that gives a user a pictorial representation of a web site. In particular, Figure 22 illustrates the operation of a link repair tool wherein a user may select an option that will display all broken links in a website and the respective pages upon which the broken links appear. As such, a user may rapidly identify all URLs that affected by the broken link. That is, the broken link's relationship to other web pages is identified.

In contrast, claim 6 recites the information regarding the web page includes at least information based on a user's relationship to the web page. Further claim 7 recites the method of claim 6, wherein the information based on the user's relationship to the web page includes the user's prior web browsing history for the web page. Weinberg simply does not teach a user's relationship to a web page. Further, claims 6 and 7 depend ultimately from claim 1 and are allowable for all the reasons that claim 1 is allowable. Applicants submit that for at least these additional reasons, claims 6 and 7 are allowable over the prior art of record.

Moreover, the Office action does not provide proper motivation for so combining the references to modify Katinsky. By law, in order to support a § 103(a) rejection, there must be some teaching, suggestion, or motivation other than applicants' teachings for modifying a cited reference or combining references to achieve the claimed invention. The Office action does not indicate any suggestion or motivation in the prior art of record, either explicit or otherwise, for modifying Katinsky or combining with other references in a manner that would achieve the claimed invention. Instead the Office action merely contends that it would have

14

been obvious to a person skilled in the art at the time the invention was made to combine the teachings of Katinsky and Weinberg to arrive at the recitations of claims 6 and 7 because the visualization by the user of the overall architecture of the web site would allow the user to navigate the map in an intuitive manner to explore the content of the web site. Such broad, conclusory statements do not come close to adequately addressing the issue of motivation to modify or combine, are not evidence of obviousness, and therefore are improper as a matter of law. *In re Dembiczak*, 175 F.3d 994, 999, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999). Moreover, applicants challenge the Office action's unsupported conclusions regarding obviousness. Instead of providing some teaching in support, the Office action merely speculated that modifying Katinsky may make the entire claim limitations would be obvious. Such speculation was based on applicants' teachings, and not on anything found in the prior art or otherwise motivated. Such wholly speculative allegations cannot reasonably be used to support these claim rejections.

With regard to claims 8-11, the Office action rejected these claims under 35 U.S.C. §103(a) as being unpatentable over Katinsky in view of Mogul. More specifically, the Office contends that Figure 2 of Mogul teaches that the information regarding the web page includes at least information based on a user relative to the web page. The Office action then concludes that it would have been obvious to a person skilled in the art at the time the invention was made to combine the teachings of Katinsky and Mogul to arrive at the recitations of claims 8-11 because it would improve the latency by predicting and anticipating the next web page

In re Application of Heilbron et al.
Serial No. 09/609,001

based on previous history before the user requests it. Applicants respectfully

disagree.

The system and method taught by Mogul is directed to "pre-fetching"

common objects from a server based upon a user's past history. Thus, based

upon commonly used programs and objects in conjunction with each other, time

may be saved by correctly predicting the next object to be requested. That is,

objects are fetched relative to a user's history. However, claims 8-11 are directed

to information being based on the user (not the user's history) relative to a web

page (not a set of objects or programs). Further, retrieving information from web

pages is not anticipated in the present invention. Rather, the information is

retrieved regardless of the user's intention, history, or choices. The information

may be further tailored based on the user relative to the web page to which the

retrieved information corresponds. Further, claims 8-11 depend ultimately from

claim 1 and are allowable for all the reasons that claim 1 is allowable. Applicants

submit that for at least these additional reasons, claims 8-11 are allowable over the

prior art of record.

Further, the Office action again fails to provide proper motivation for so

combining the references to modify Katinsky. The Office action does not indicate

any suggestion or motivation in the prior art of record, either explicit or otherwise,

for modifying Katinsky or combining with other references in a manner that would

achieve the claimed invention. Instead the Office action merely contends that it

would have been obvious to a person skilled in the art at the time the invention was

made to combine the teachings of Katinsky and Mogul to arrive at the recitations of

claims 8-11 because it would improve the latency by predicting and anticipating the next web page based on previous history before the user requests it. Such broad, conclusory statements do not come close to adequately addressing the issue of motivation to modify or combine, are not evidence of obviousness, and therefore are improper as a matter of law. *In re Dembiczak*, 175 F.3d 994, 999, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999). Such wholly speculative allegations cannot reasonably be used to support these claim rejections.

With regard to claim 12, the Office action rejected these claims under 35 U.S.C. §103(a) as being unpatentable over Katinsky in view of Freund. Freund describes, generally, the use of a local cache to improve the speed of web page surfing, but does not disclose displaying a link in one of a number of colors based on a predetermined criteria as recited by claim 12. Furthermore, claim 12 depends from claim 1 and applicants submit that claim 12 is allowable for at least the reasons that claim 1 is allowable.

Turning to amended claim 13, it recites a machine-readable medium having instructions stored thereon for execution by a client processor to perform a method comprising fetching a current web page, the current web page including one or more links, each link pointing to a web page, fetching information regarding the web page to which each link points, wherein the information is stored separately from the current web page, displaying the current web page, and displaying an informational region, in response to a cursor hovering over a particular link of the one or more links, the region including the information previously fetched regarding the web page to which the link points.

17

The Office action rejected claim 13 as being anticipated by Katinsky for the identical reasons that the Office action gave for the rejection of claim 1. However, as previously discussed regarding claim 1, Katinsky does not teach fetching a web page, let alone fetching a web page that includes one or more links. Rather, Katinsky teaches fetching one or more media objects and then creating links on a pageless Internet site such that a user may click an icon and instantiate the media object. Further, Katinsky teaches displaying a pageless Internet site that simply contains links to the already downloaded media objects and not other web pages (or even other media objects). Nor does Katinsky teach displaying an informational region, in response to a cursor hovering over a particular link of the one or more links. Rather, Katinsky teaches displaying information in response to a user clicking on a pop-up menu. Significantly, clicking on a pop-up menu is not the same as hovering over a link as recited in claim 13. Moreover, Katinsky does not teach that the region includes the information previously fetched regarding the web page to which the link points. Rather, Katinsky teaches displaying information about the media object itself. For at least these reasons, applicants submit that claim 13 is allowable over the prior art of record.

Further, claims 14-21 depend either directly or indirectly from claim 13 and are therefore allowable by virtue of their dependence from claim 13. Claims 14-21 are also allowable for at least the additional reasons that were presented above with respect to claims 2-12.

Turning to claim 22, it recites a computerized system comprising at least one first entity storing web pages, at least one second entity separate from the first

entity storing information regarding the web pages, and, at least one client, each client able to browse web pages such that fetching of a web page from at least one first entity causes the fetching of information about other web pages from at least one second entity and such that positioning of a cursor over a link of a current web page causes display of an informational region including information regarding a web page to which the link points as stored on the at least one second entity.

The Office action rejected claim 22 as being anticipated by Katinsky. Again, the identical reasons were given in the rejection of claim 22 as were given for the rejection of claim 1. Applicants respectfully disagree.

As pointed out previously, Katinsky does not teach fetching a web page, fetching information about links within a fetched web page, or displaying the retrieved information about other web pages to which the links correspond. Further, Katinsky does not teach a first entity, a second entity, and a client as recited in claim 22. For at least these additional reasons, applicants submit that claim 22 is allowable over the prior art of record.

Claims 23 and 24 depend from claim 22 are allowable at least by virtue of their dependence from claim 22.

Turning to claim 25, claim 25 recites a computerized system comprising, at least one first entity capable of storing web pages, at least one second entity capable of providing summaries of the web pages, at least one third entity capable of providing for a given web page stored by the first entity, a list of all links on the web page and for each of the links, the corresponding summary, provided by the second entity, and, at least one client, each able to browse web pages such that

fetching of a web page from the at least one first entity causes fetching information provided by the third entity and such that positioning of a cursor over a link of a current web page causes display of an informational region including information regarding a web page to which the link points.

The Office action rejected claim 25 as anticipated by Katinsky. Again, the identical reasons were given in the rejection of claim 25 as were given for the rejection of claim 1. Applicants respectfully disagree.

As pointed out previously, Katinsky does not teach fetching a web page, fetching information about links within a fetched web page, or displaying the retrieved information about other web pages to which the links correspond. Further, Katinsky does not teach a first entity, a second entity, and a client as recited in claim 25. For at least these additional reasons, applicants submit that claim 25 is allowable over the prior art of record.
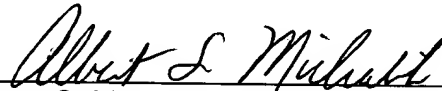
For at least these additional reasons, applicants submit that all the claims are patentable over the prior art of record. Reconsideration and withdrawal of the rejections in the Office Action is respectfully requested and early allowance of this application is earnestly solicited.

CONCLUSION

In view of the foregoing remarks, it is respectfully submitted that claims 1-25 are patentable over the prior art of record, and that the application is good and proper form for allowance. A favorable action on the part of the Examiner is earnestly solicited.

If in the opinion of the Examiner a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney at (425) 836-3030.

Respectfully submitted,

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CERTIFICATE OF MAILING

I hereby certify that this Amendment and Petition for Extension of Time,

along with Transmittal and Change of Correspondence Address are being

deposited with the United States Postal Service on the date shown below with

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Commissioner for Patents, Alexandria, VA 22313-1450.

Date: March 3, 2004   _Albert S. Michalik_

                                            Albert S. Michalik

2920 Amendment

22